

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	
ADVANTAGE HOLDCO, INC., et al. ¹ ,	:	Case No. 20-11259 (CTG)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	
CBIZ Accounting, Tax and Advisory of	:	
New York, LLC, Trustee of the	:	
Advantage Rent A Car Unsecured	:	
Creditor Trust Liquidating Trust,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Adv. Pro. No. 22-50363 (CTG)
	:	
Colby Auto Investments, Inc.,	:	
	:	
Defendant.	:	
	:	

PLAINTIFF’S REQUEST FOR DEFAULT JUDGMENT

TO THE CLERK OF THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE:

Plaintiff has requested that a default be entered against the above-named defendant in the above captioned action (the “Defendant”). Upon entry of the default, the above-named plaintiff requests entry of a default judgment against the Defendant pursuant to Fed. R. Civ. P. 55(b)(1), made applicable by Fed. R. Bankr. P. 7055, in the following sum-certain amount based on the

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Advantage Holdco, Inc. (4832); Advantage Opco, LLC (9101); Advantage Vehicles LLC (6217); E-Z Rent A Car, LLC (2538); Central Florida Paint & Body, LLC (1183); Advantage Vehicle Financing LLC (7263); and RAC Vehicle Financing, LLC (8375).

Complaint and the Declaration of Sarah M. Ennis In Support of Plaintiff's Request for Default, attached to Plaintiff's Request for Entry of Default as **Exhibit A**, and filed concurrently herewith.

Principal:	\$56,328.00
Filing Fees	<u>\$350.00</u>
Total:	\$56,678.00

Dated: December 8, 2022
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Sarah M. Ennis

Eric J. Monzo (DE Bar No. 5214)
Sarah M. Ennis (DE Bar No. 5745)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: emonzo@morrisjames.com
E-mail: sennis@morrisjames.com

*Counsel to CBIZ Accounting, Tax and Advisory of
New York, LLC, Trustee of the Advantage Rent A Car
Unsecured Creditor Trust Liquidating Trust*